

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SA MUSIC, LLC, et al.,

Plaintiffs,

v.

AMAZON.COM, INC. et al.

Defendants.

No. 2:20-cv-0579-BJR

**JOINT STIPULATION TO EXTEND  
DISCOVERY AND CASE-RELATED  
DEADLINES AND ORDER**

Plaintiffs SA Music, LLC; William Kolbert, as Trustee of the Harold Arlen Trust; Ray Henderson Music Company; Four Jays Music Company; and Julia Riva (collectively, "Plaintiffs") and Defendants Amazon.com, Inc. and Amazon.com Services LLC (collectively, "Defendants")<sup>1</sup> hereby stipulate and agree as follows:

WHEREAS, on April 16, 2020, Plaintiffs filed the Complaint in this case alleging copyright infringement against Defendants (Dkt No. 1);

WHEREAS, the Court entered a Pretrial Scheduling Order on July 9, 2020, which included a discovery cutoff date of June 9, 2021 (Dkt. No. 27);

WHEREAS, the parties have diligently conducted discovery and attempted in good faith to resolve discovery-related disputes;

WHEREAS, the parties have attempted in good faith to resolve the claims in this case;

<sup>1</sup> Additional defendants Pickwick International Limited, Pickwick Group Limited, Pickwick Australia PTY LTD, and Mastercorp PTY LTD have not yet appeared in this litigation.

1 WHEREAS, good cause exists for extending the fact and expert discovery deadlines to  
2 accommodate the logistical burdens of completing discovery obligations during the COVID-19  
3 pandemic and coordinating with parties headquartered outside of the United States;

4 WHEREAS, good cause exists for extending the pretrial and other case-related deadlines  
5 to accommodate the extension of discovery; and

6 WHEREAS, the parties have not previously sought any extensions of the deadlines in this  
7 case;

8 NOW, THEREFORE, the parties stipulate to and move the Court for entry of the following  
9 schedule pursuant to Local Rule 7(d)(1), which extends the discovery and other case-related  
10 deadlines by approximately 90 days:

- 11 1. Reports of experts witnesses under FRCP 26(a)(2) due **August 9, 2021**.
- 12 2. Discovery to be completed by **September 7, 2021**.
- 13 3. All dispositive motions must be filed by **September 7, 2021**.
- 14 4. All motions *in limine* must be filed by **January 31, 2022**.
- 15 5. Joint Pretrial Statement shall be filed by **February 7, 2022**.
- 16 6. Pretrial conference – **To be scheduled by the Court**.
- 17 7. Jury Trial - **To be scheduled by the Court**.

1  
2 DATED: April 16, 2021

3 s/ Eric J. Weiss  
4 Eric J. Weiss, WSBA No. 44807  
5 David T. Martin, WSBA No. 50160  
6 **Perkins Coie LLP**  
7 1201 Third Avenue, Suite 4900  
8 Seattle, WA 98101-3099  
9 Telephone: 206.359.8000  
10 Facsimile: 206.359.9000  
11 Email: EWeiss@perkinscoie.com  
12 DMartin@perkinscoie.com

13 s/ Kenneth L. Steinthal  
14 Kenneth L. Steinthal (*Pro Hac Vice*)  
15 **King & Spalding LLP**  
16 50 California Street, Suite 3300  
17 San Francisco, CA 94111  
18 Telephone: 415.318.1200  
19 Facsimile: 415.318.1300  
20 Email: KSteinthal@kslaw.com

21 *Attorneys for Defendants Amazon.com, Inc.,*  
22 *and Amazon Services LLC*  
23  
24  
25  
26

1 DATED: April 16, 2021

s/ Matthew F. Schwartz

Matthew F. Schwartz (*Pro Hac Vice*)

Brian S. Levenson (*Pro Hac Vice*)

**Schwartz Ponterio & Levenson PLLC**

134 West 29th Street, Suite 1001

New York, NY 10001

Telephone: 212.714.1200

Facsimile: 212.714.1264

Email: mschwartz@splaw.us

Email: blevenson@splaw.us

s/ Philip P. Mann

Philip P. Mann, WSBA No. 28860

**Mann Law Group PLLC**

1420 Fifth Avenue, Suite 2200

Seattle, Washington 98101

Phone: (206) 436-0900

E-mail: phil@mannlawgroup.com

Oren S. Giskan (*Pro Hac Vice*)

**Giskan Solotaroff & Anderson LLP**

90 Broad Street, 10th Floor

New York, New York 10004

Telephone: (212) 847-8315

E-mail: ogiskan@gslawny.com

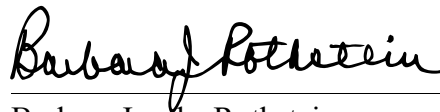
*Attorneys for Plaintiffs*

**ORDER**

Pursuant to the parties' stipulation, it is so ordered. In addition:

- Pretrial Conference is set for February 22, 2022 at 11:00 AM;
- Jury Trial is set for March 7, 2022 at 9:30 AM.

Dated this 26th day of April, 2021.



Barbara Jacobs Rothstein  
U.S. District Court Judge

Presented by:

s/ Eric J. Weiss

Eric J. Weiss, WSBA No. 44807

David T. Martin, WSBA No. 50160

**Perkins Coie LLP**

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Telephone: 206.359.8000

Facsimile: 206.359.9000

Email: EWeiss@perkinscoie.com

DMartin@perkinscoie.com